



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

APR 16 2015

Mr. Virgil Moorehead
Chairman
Big Lagoon Rancheria
Post Office Drawer 3060

RE: U.S. EPA Indian Environmental General Assistance Program
GA-99T16001-1
Application Due: MAY 21 2015

Dear Chairman Moorehead:

I am pleased to inform you that your proposal submitted to this office under the U.S. Environmental Protection Agency's Indian Environmental General Assistance Program (GAP) has been tentatively approved for funding. At this time, I am setting aside \$128,000 of funding to support your GAP for one year. An additional \$8,113 has been tentatively set aside for supplemental activities as follows: \$868 towards a laptop computer; and \$7,245 for a one-time increase of .1 FTE for the environmental technician to support the development of the Tribe's Clean Air Program. The total tentative award for your GAP is \$136,113.

However, according to Big Lagoon Rancheria's FY15 GAP first quarterly report, the Tribe will have unexpended funds under the current grant. According to our latest projections, the Tribe will have at least \$10,000 of GAP funds left in their grant as of September 30, 2015. Because the Tribe will have at least a \$10,000 grant balance, the tentative award of new funding for 2015-2016 will be reduced to \$126,113. **Please use the amount of \$126,113 when developing your SF-424 Budget Summary and Application.**

Although your SF-424 Budget Summary and Application should reflect only **\$126,113** of new tentative funding to the Tribe, please prepare a budget breakdown showing how the entire \$136,113 will be utilized. To avoid confusion with how much new funding the Tribe will be receiving, please ensure the budget breakdown is not provided on a SF-424 form. A grant balance budget sample is attached. It shows how new funds and unspent grant funds should be combined into a single budget breakdown.

Work plan submission, negotiation, and approval will be conducted electronically in GAP Online. The comments attached here for your reference are also available in GAP Online. If we receive your complete application and an **approvable** revised work plan by the due date we will make every effort to award the grant by September 30, 2015. This funding will support work plan activities **from October 1, 2015 to September 30, 2016**. Please do not incur any costs under this work plan until the official grant award document has been signed and dated by the EPA Award Official. Any costs incurred before the date of award will not be reimbursed.

This letter does not constitute a grant award. In order to receive funding, the Big Lagoon Rancheria will need to complete an Application for Federal Assistance (SF-424). **The complete application, including an updated work plan, must be submitted for EPA review by the due date indicated above.**

Materials can be submitted earlier and will be processed on a first-come, first-served basis. Please note that in completing your application, you will need to enter the GAP Catalog of Federal Domestic Assistance Number (CFDA), required in box #11 on the SF-424A application form, 66.926.

New Process for Submitting Your GAP Grant Application

Effective February 17, 2015, EPA grant applicants **must** use Grants.gov to submit their applications. The Grants.gov registration process can take up to 30 days to complete. Therefore, it is highly recommended that EPA applicants complete their registration on Grants.gov now. Also, your organization's registration in SAM.gov must be active to utilize Grants.gov. If it appears that the grants.gov registration process may prevent you from submitting your application by the due date aforementioned, then please contact Support@grants.gov or call 1-800-518-4726 as support is available 24 hours a day and 7 days a week. You should also notify your Project Officer before the application due date to request an extension.

Please review both Attachment 2 on Grants.gov instructions and Attachment 3 on Region 9 Guidance Information for Applicants (or go to <http://www.epa.gov/region9/funding/information.html>) to find additional resources on Grants.gov, Federal Regulations, and new EPA requirements. We suggest you forward these materials to your Project Manager, Financial Officer, and any other personnel in your organization requiring this information.

I look forward to working with you and your staff under the General Assistance Program. Questions regarding the completion of the application forms as well as the mandatory use of grants.gov should be referred to Darlene Fernandez, Grants Management Specialist, at (415) 972-3664. You can also contact your GAP Project Officer, Michelle Baker at (415) 972-3206 if you have questions regarding this letter, the work plan or the General Assistance Program.

Sincerely,



Laura M. Ebbert
Manager
Tribal Section

Enclosures

1. Work Plan Comments with Component Cost and Work Years Guidance
2. Grants.gov Instructions Guide
3. Region 9 Guidance Information for Applicants
4. Grant Balance Budget Breakdown Sample

cc: Shawna Neyra Tribal Environmental Planner (with work plan comments)

GAP 2015-2016 Work plan Comments

Big Lagoon Rancheria

Thank you for developing a work plan with your 2015-2016 GAP proposal. The following comments are intended to strengthening the Tribe's GAP work plan and ensure it meets GAP guidelines. Please ensure that these comments are addressed in your final GAP work plan in GAP Online.

General Definitions and References

1. The following references are useful for understanding GAP in general, for getting an understanding for environmental outcomes, etc.
2013 Guidance on the Award and Management of General Assistance Program Agreements and Appendix I, Guidebook for Building Tribal Environmental Program Capacity
<http://www.epa.gov/region09/funding/pdfs/tribal-gap14/fy2014-r9-gap-guidance.pdf>
GAP Act (<http://www.epa.gov/Indian/pdfs/4368b.pdf>)
2014 GAP Grant Notification (<http://www.epa.gov/region09/funding/tribal-gap.html>)
EPA Strategic Plan (<http://www.epa.gov/ocfo/plan/plan.htm>)
2. Environmental outcomes should be expressed in terms of improvements to public health, the environment, or human behavior. They can also reflect improved tribal capacity to protect public health or the environment. Intermediate outcomes could reflect: a) improved human health or environmental conditions, b) reduced risks to human health or the environment, c) increased tribal capabilities in legal, enforcement, technical, communication, or administrative areas. Long-term outcomes could include attainment of desired environmental conditions (e.g., water quality standards are met) or human health goals, attainment of a desired capacity to plan, develop, implement, manage and sustain tribal environmental programs.
3. Please ensure that the total work plan Estimated Component Costs add up to the total approved budget amount indicated in the cover letter, and that the total work plan Estimated Work Years adds up to the total number of approved personnel funded under GAP. I have attached a document entitled "Component Cost and Work Years Guidance" that will help to correctly identify Component Costs and Work Years to comply with this request.
4. **Greening Grants Policy:** EPA Region 9 has adopted a Greening Grants Policy which encourages grantees to carry out their EPA grant funded projects in a greener way. Your Project Officer will work with you to determine whether it is feasible to incorporate green practices into your work plan. The Greening Grants Policy includes an attachment which describes many useful green practices. The policy furthers the objectives of EPA's 2011-15 Strategic Plan. The link to Greening Grant Policy is on the Region 9 Website Homepage, <http://www.epa.gov/region9/funding/greening-grants.html>

5. Regarding Indirect Costs

For Fixed/Carry forward Tribal IDC rate:

EPA may allow IDC costs to be budgeted for grants when indirect costs rates have been approved within the preceding three fiscal years. When IDC rates are not current at the time of the grant award, a term and condition will be used to require the Tribe to notify EPA and refund any overfunded amounts. Please refer to CFR 2, Part 200, Section 200.414 for more information regarding indirect cost rates.

BUDGET COMMENTS

Budget: Please provide a final budget and work plan that matches the amount of funds being offered. This amount includes the personnel and supply costs as detailed below.

Personnel: The FY16 Big Lagoon proposal requested a total of 1.4 FTE. In FY15, Big Lagoon was funded to support 1.4 FTE and this included a one-time .25 FTE increase for the Tribal Environmental Technician (TEP) position to complete the Big Lagoon Tribal Environmental Plan and develop and coordinate a Community Advisory Group. This .25 FTE was not a permanent increase and does not continue into FY16. However, a one-time increase of .10 FTE for the TEP is tentatively approved for one year in the amount of \$7,245, which includes fringe and indirect costs. This one-time increase is to support the development, and build capacity for the Tribe's Air Program.

Since EPA is unable to approve the total amount of requested funds, the Tribe should be aware that any increases in FTE under this GAP grant involves a risk: the Tribal Program Office cannot guarantee that funding for increased FTE can be maintained through future funding cycles, especially given that funding of the GAP program at a national level has not increased significantly over the last few budget cycles and in some years, the program has experienced a net reduction. The Tribe is advised to consider these issues when choosing to fund additional FTE within the GAP program. If you choose to increase funding for FTE, this will likely result in a decrease in funds available to operate the program.

Travel: GAP will fund travel in the amount of \$1,800. Please ensure this line item is reflected in your final budget application. If additional travel is needed, the Tribe can request support through the Tribal Travel Fund. Please contact Tim Grant at 415-972-3783, or your Project Officer for more information.

Supplies: GAP will partially fund the purchase of one laptop computer in the amount of \$868, because it is being shared with another program. Please ensure this amount is reflected in your final budget application.

WORK PLAN COMMENTS

Most components in your work plan contain several capacity indicators. Please ensure that these indicators appropriately link to the steps that are either underway or proposed to begin in the

associated commitments, and remove any indicators that have already been achieved. Capacity indicators represent the destination of the Tribe's work, and therefore the Tribe should express how it will accomplish the tasks necessary to achieve the indicators proposed in its commitments. Moreover, capacity indicators should ideally be placed in the "Measures" section for each component in the work plan. More information on the appropriate use of indicators is found on page 13 of the GAP Guidance. A suite of indicators that the Tribe may consider for inclusion in its work plan is contained in Appendix I of the GAP Guidebook.

Please ensure each commitment provides **why** the Tribe has proposed each activity, **who** will need to do **what**, **where**, **when** and **how**, to complete proposed activities. This type of information helps quantify the level of effort (FTE and Cost) required to complete commitments, which in turn helps project officers determine if identified costs appear reasonable. Build this type of information into each of your commitment descriptions.

Component 1: Management of Environmental Office

Please remove the indicators for which capacity has already been established. Please ensure that the indicators listed appropriately link to the commitments being proposed.

Commitment 1.1: This commitment is acceptable. No changes are needed.

Commitment 1.2: This commitment is acceptable. No changes are needed.

Commitment 1.3: When reporting on this commitment, please include a list of grants being applied for and the outcome of the applications when they become available.

Commitment 1.4: This commitment is acceptable. No changes are needed.

Commitment 1.5: This commitment is acceptable. No changes are needed.

Commitment 1.6: This commitment is acceptable. No changes are needed.

Component 2: Travel and Training

Please remove the indicators for which capacity has already been established. Please ensure that the indicators listed appropriately link to the commitments being proposed.

Commitment 2.1: This commitment, including travel costs, was funded in FY15 and was not completed. FY15 carryover funding should be used to cover this commitment for FY16.

Commitment 2.2: This commitment is acceptable. No changes are needed.

Commitment 2.3: This commitment is acceptable. No changes are needed.

Component 3: Community Outreach and Education

Please remove the indicators for which capacity has already been established. Please ensure that the indicators listed appropriately link to the commitments being proposed.

Commitment 3.1: This commitment is acceptable. No changes are needed.

Commitment 3.2: This commitment is acceptable. No changes are needed.

Commitment 3.3: This commitment is acceptable. No changes are needed.

Component 4: Solid Waste Planning and Implementation

Please remove the indicators for which capacity has already been established. Please ensure that the indicators listed appropriately link to the commitments being proposed.

Commitment 4.1: Please remove this commitment, as it is no longer eligible for GAP funding. The Tribe's recycling program has been supported as a pilot project for more than four years and exceeds the amount of time in which GAP funding can be used to support a pilot project.

Commitment 4.2: This commitment is acceptable. However, in addition to the nuisance waste, please consider completing a trend analysis for all wastes generated on the Rancheria over the past five years.

Commitment 4.3: Household Hazardous Waste (HHW) collection events are a way to ensure proper disposal of household hazardous waste generated in the community. Careful consideration of the federal and applicable state regulations related to the storage and transportation of these materials is needed before an event is planned. Please consult EPA's "Household Hazardous Waste Collection: a Program Guide for Tribal Governments," for detailed information (link below). Deliverable 4.3 should include the amount and types of waste collected/recycled during the event. The Region 9 GAP encourages the creation of long-term sustainable waste management programs. As such, as a commitment to this grant, the Tribe is requested to research and submit information on other HHW collection events that may be taking place within the County or other local jurisdictions to determine if the Tribe might partner with other entities to ensure events are cost effective. This assessment should take place during Quarter One.

<http://www.epa.gov/region9/waste/tribal/pdf/final-hhw-guide-oct-2007.pdf>

Commitment 4.4: Prior to undertaking open dump cleanup or closure activities, an [open dump survey form](#) for each site must be completed and submitted to EPA for review and approval; please add the completion of survey forms for all sites not surveyed and ranked to the workplan as activities to be completed in Quarter One. Other deliverables must include the amount and types of waste removed/recycled during a dump cleanup.

Commitment 4.5: This commitment is acceptable. No changes are needed.

Component 5: Clean Water Activities

Commitment 5.1: This commitment is acceptable. No changes are needed.

Commitment 5.2: This commitment is acceptable. No changes are needed.

Commitment 5.3: This commitment is acceptable. No changes are needed.

Commitment 5.4: This commitment is acceptable. No changes are needed.

Component 6: Consultation Collaboration and Partnering

Please remove the indicators for which capacity has already been established. Please ensure that the indicators listed appropriately link to the commitments being proposed.

Commitment 6.1: This commitment is acceptable. No changes are needed.

Commitment 6.2: This commitment is acceptable. No changes are needed.

Component 7: Pollution Prevention

Please remove the indicators for which capacity has already been established. Please ensure that the indicators listed appropriately link to the commitments being proposed.

Commitment 7.1: This commitment is acceptable. No changes are needed.

Commitment 7.2: This commitment is acceptable. No changes are needed.

Component 8: Clean Air Activities

Commitment 8.1: This commitment is acceptable. No changes are needed.

Commitment 8.2: This commitment is acceptable. No changes are needed.

Commitment 8.3: EPA R9 encourages collaboration with federal, local, and national partners who could partner with your department on addressing IAQ issues and community outreach.

Suggested resources:

- Institute for Tribal Environmental Professionals (<http://www4.nau.edu/itep/>)
- National Tribal Air Association (<http://www4.nau.edu/itep/ntaa/>)
- Tribal Healthy Homes Network Northwest (<http://thhnw.org/>)
- EPA Sites:
 - Tools for Schools (<http://www.epa.gov/iaq/schools/>)
 - Indoor Air Quality (<http://www.epa.gov/iaq/>)
 - Mold (<http://www.epa.gov/mold/>)
 - Asthma Community Network (<http://www.asthmacommunitynetwork.org/>)

EPA Region 9's IAQ Team is ready to provide technical support, share available resources, and talk further about your IAQ strategy. Please do not hesitate to reach out to us:

Priyanka Pathak
pathak.priyanka@epa.gov
Phone: 415-972-3576

Shelly Rosenblum
Rosenblum.Shelly@epa.gov
415-947-4193

Katie Stewart
Stewart.Kathleen@epa.gov
Phone: 415-947-4119

Commitment 8.4: This commitment is acceptable. No changes are needed.

Component Cost and Work Years Guidance

Applications must include estimated component cost and associated work years. Often applicants provide estimated costs that do not, when added together, equal the total budget request and budgeted FTE supplied with the work plan. Currently the sub-commitments in Commitment 2 of the revised workplan does not equal the full Commitment 2 estimate amount.

Suggested instructions:

Estimated Component Costs should, when added together, equal the total budgeted amount. Two suggested ways to arrive at numbers that are equal:

- 1) Evaluate the relative *percentage* of financial resources each work plan task will take, each task being some percentage of 100; multiply that percentage by the total budgeted cost to get the estimated cost per component.

| | Component 1 | Component 2 | Component 3 | Total Budget |
|----------------------|-------------|-------------|-------------|--------------|
| Percentage of Total: | 25% | 45% | 30% | 100% |
| Cost: | \$ 29,319 | \$ 52,774 | \$ 35,183 | \$ 117,275 |

- 2) Alternately, as an addendum to calculation of the Total Program Budget, add columns wherein the contribution of each component to the total budget is calculated, and total component budgets across budget categories, applying indirect costs if applicable, personnel costs, and fringe. This "estimate" leans more toward accurate budget numbers.

| Category | TOTAL | Component 1 | Component 2 | Component 3 |
|-------------------|------------|-------------|-------------|-------------|
| (FTE) | 1.5 | 0.375 | 0.6 | 0.525 |
| Personnel | \$ 55,000 | \$ 13,750 | \$ 22,000 | \$ 19,250 |
| Fringe | \$ 18,150 | 4,537.50 | 7,260.00 | 6,352.50 |
| Supplies | \$ 5,000 | 500 | 4100 | 400 |
| Travel | \$ 5,000 | 4200 | 800 | 0 |
| Equipment | \$ - | 0 | 0 | 0 |
| Contractual | \$ 15,000 | 4000 | 8000 | 3000 |
| Subtotal | \$ 98,150 | \$ 26,988 | \$ 42,160 | \$ 29,003 |
| Base for Indirect | \$ 83,150 | \$ 22,988 | \$ 34,160 | \$ 26,003 |
| Indirect | \$ 19,125 | \$ 5,287 | \$ 7,857 | \$ 5,981 |
| Total | \$ 117,275 | \$ 32,275 | \$ 50,017 | \$ 34,983 |

Estimated Component work years should, when added together, equal the total budgeted FTE for the program. One work year is equal to 2,080 personnel hours. A work year is also known as a full time equivalent (FTE), since it is based on a full time job; 40 hours per week * 52 weeks per year = 2,080 hours per year.

Two suggested ways to arrive at numbers that are equal:

- 1) Evaluate the relative *percentage* of staffing resources each work plan component will require, each component being some percentage of 100; multiply the percentage for each component by the total requested FTE to arrive at the estimated FTE per component.

| <i>staffing</i> | Component 1 | Component 2 | Component 3 | Total Budget |
|----------------------|-------------|-------------|-------------|--------------|
| Percentage of Total: | 25% | 40% | 35% | 100% |
| Cost: | 0.38 | 0.60 | 0.53 | 1.50 |

- 2) Alternately, when calculating the budget in the detailed manner for the Estimated Component Cost, take the FTE applied to each component and use that value to represent the estimated component FTE.

EPA Region 9 - Grants.gov Instructions Guide

(March 2015)

Applications for Federal assistance must be submitted through Grants.gov.

Register with Grants.gov! In order to submit your application using Grants.gov, your organization must be registered with Grants.gov. Please allow four weeks to complete the registration process. Also, please note that you must have a DUNS number and an active SAM.gov registration before registering with Grants.gov. You can find more information about registering at:


<http://www.grants.gov/web/grants/applicants/organization-registration.html>

To Access and Download Grant Application Package go to:

<http://www.grants.gov/web/grants/applicants/download-application-package.html>

1. Funding Opportunity Number (FON).

- A. **Competitive Programs:** Refer to the competitive solicitation for the applicable FON. Applicant will enter this into the "Funding Opportunity Number" field to locate the application package.
- B. **Non-Competitive Discretionary Programs:** Obtain FON from your EPA Point of Contact (POC). Applicant will enter this into the "Funding Opportunity Number" field to locate the application package.
- C. **Continuing Environmental Programs (CEPs):** The list of available CFDA numbers for CEPs have been divided between two FONs. The two FONs used to access the application packages are **EPA-CEP-01** and **EPA-CEP-02**. Refer to the following Attachment to determine which FON your CFDA is published under. Applicant will enter this into the "Funding Opportunity Number" field to locate the packages.

| | | |
|---|----------------------|----|
| CFDA Number: | <input type="text"/> | (# |
|  Funding Opportunity Number: | <input type="text"/> | (C |
| Funding Opportunity Competition ID: | <input type="text"/> | (C |
| <input type="button" value="Download Package"/> | | |

- 2. **Download the package** associated with CFDA 66.XXX.
- 3. **Complete the Grant Application Package.** Attach the forms and information required by your particular program. **Contact your EPA POC if you have questions about which forms and materials you must submit for your program.**
- 4. **Submit your application.** Go to <http://www.grants.gov/web/grants/applicants/apply-for-grants.html> for more information on this process.
- 5. **Confirm with your EPA POC** that EPA has received your application package. **If for ANY reason you cannot submit your application by the deadline specified, contact your EPA POC immediately.**

For FAQs, User Guides, Checklists, Training and Technical Support, visit the Grants.gov Applicant Resource page at <http://www.grants.gov/web/grants/applicants/applicant-resources.html>

Technical Questions or Issues? Please call (1-800-518-4726) or email (support@grants.gov) the Grants.gov Contact Center (<http://www.grants.gov/web/grants/about/contact-us.html>). Help is available 24 hours a day, 7 days a week.

Grants.gov Instructions Guide

Continuing Environmental Programs (CEPs)

(EPA Mandatory Grant Programs)

ATTACHMENT

CFDAs Under EPA-CEP-01

| | |
|--------|---|
| 66.001 | Air Pollution Control Program Support |
| 66.032 | State Indoor Radon Grants |
| 66.034 | Surveys, Studies, Research, Investigations, Demonstrations, and Special Purpose Activities Relating to the Clean Air Act |
| 66.038 | Training, Investigations, and Special Purpose Activities of Federally-Recognized Indian Tribes Consistent With the Clean Air Act (CAA), Tribal Sovereignty and the Protection and Management of Air Quality |
| 66.040 | State Clean Diesel Grant Program This program contains Recovery Act funding. |
| 66.042 | Temporally Integrated Monitoring of Ecosystems (TIME) and Long-Term Monitoring (LTM) Program |
| 66.121 | Puget Sound Protection and Restoration: Tribal Implementation Assistance Program |
| 66.124 | Coastal Wetlands Planning Protection and Restoration Act |
| 66.125 | Lake Pontchartrain Basin Restoration Program (PRP) |
| 66.202 | Congressionally Mandated Projects |
| 66.418 | Construction Grants for Wastewater Treatment Works This program contains Recovery Act funding. |
| 66.419 | Water Pollution Control State, Interstate, and Tribal Program Support |
| 66.432 | State Public Water System Supervision |
| 66.433 | State Underground Water Source Protection |
| 66.437 | Long Island Sound Program |
| 66.454 | Water Quality Management Planning This program contains Recovery Act funding. |
| 66.456 | National Estuary Program |
| 66.458 | Capitalization Grants for Clean Water State Revolving Funds This program contains Recovery Act funding. |
| 66.460 | Nonpoint Source Implementation Grants |
| 66.466 | Chesapeake Bay Program |
| 66.468 | Capitalization Grants for Drinking Water State Revolving Funds This program contains Recovery Act funding. |
| 66.469 | Great Lakes Program |
| 66.472 | Beach Monitoring and Notification Program Implementation Grants |
| 66.473 | Direct Implementation Tribal Cooperative Agreements |
| 66.481 | Lake Champlain Basin Program |
| 66.482 | Disaster Relief Appropriations Act (DRAA) Hurricane Sandy Capitalization Grants For Clean Water State Revolving Funds |
| 66.483 | Disaster Relief Appropriations Act (DRAA) Hurricane Sandy Capitalization Grants for Drinking Water State Revolving Funds |
| 66.508 | Senior Environmental Employment Program This program contains Recovery Act funding. |
| 66.517 | Regional Applied Research Efforts (RARE) |
| 66.518 | State Senior Environmental Employment Program |
| 66.600 | Environmental Protection Consolidated Grants for the Insular Areas - Program Support |
| 66.605 | Performance Partnership Grants |

CFDAs Under EPA-CEP-02

| | |
|--------|--|
| 66.700 | Consolidated Pesticide Enforcement Cooperative Agreements |
| 66.701 | Toxic Substances Compliance Monitoring Cooperative Agreements |
| 66.707 | TSCA Title IV State Lead Grants Certification of Lead-Based Paint Professionals |
| 66.714 | Regional Agricultural IPM Grants |
| 66.801 | Hazardous Waste Management State Program Support |
| 66.802 | Superfund State, Political Subdivision, and Indian Tribe Site-Specific Cooperative Agreements This program contains Recovery Act funding. |
| 66.804 | Underground Storage Tank Prevention, Detection and Compliance Program |
| 66.805 | Leaking Underground Storage Tank Trust Fund Corrective Action Program This program contains Recovery Act funding. |
| 66.808 | Solid Waste Management Assistance Grants |
| 66.809 | Superfund State and Indian Tribe Core Program Cooperative Agreements |
| 66.817 | State and Tribal Response Program Grants |
| 66.819 | Disaster Relief Appropriations Act (DRAA) Hurricane Sandy Leaking Underground Storage Tank Trust Fund Corrective Action Program |
| 66.926 | Indian Environmental General Assistance Program (GAP) |
| 66.931 | International Financial Assistance Projects Sponsored by the Office of International and Tribal Affairs |

ATTACHMENT
Region 9 Guidance Information for Applicants
<http://www.epa.gov/region9/funding/information.html>

- **Omni-Circular under 2 CFR 200 & EPA Regulations under 2 CFR 1500:**

EPA has officially adopted the OMB Omni-Circular effective **December 26, 2014**. Specifically, in a **joint interim final rule** published in the Federal Register on December 19, 2014 (see 79 Fed. Reg. 76050-76063), EPA adopted the Omni-Circular. This includes adoption of Omni-Circular requirements located at **2 CFR 200** along with EPA-specific provisions mandated by statute, regulation or agency policy now codified under **2 CFR 1500**. OMB's website at **<https://cfo.gov/cofar/>** is the location for resources regarding the Omni-Circular, including **OMB's Frequently Asked Questions (FAQ)**.

Federal Register:

<http://www.gpo.gov/fdsys/pkg/FR-2014-12-19/pdf/2014-28697.pdf>

2 CFR 200:

<http://www.ecfr.gov/cgi-bin/text-idx?SID=4467ef7edf6418328185fefd45270f1f&node=pt2.1.200&rgn=div5>

2 CFR 1500:

<http://www.ecfr.gov/cgi-bin/text-idx?SID=ac772c78043ca73b46f5d168dd3f038f&tpl=/ecfrbrowse/Title02/2chapterXV.tpl>

OMB's FAQ:

<https://cfo.gov/wp-content/uploads/2014/11/2014-11-26-Frequently-Asked-Questions.pdf>

- **Interim Financial Assistance Conflict of Interest Policy:**

In accordance with the Omni-Circular's Conflict of Interest disclosure requirements under **2 CFR 200.112**, EPA issued the **Interim Financial Assistance Conflict of Interest Policy**. Requirements include applicants providing a prominently titled conflict of interest disclosure statement attached to the SF 424, if applicable. This policy applies to all individuals and non-federal entities requesting and receiving EPA financial assistance on or after **December 26, 2014**. (Note: A standard EPA form is not currently available for the COI disclosure requirement since this is an interim policy.)

Interim Policy:

http://www.epa.gov/ogd/epa_interim_financial_assistance_coi_policy.htm

- **Submission of Grant Applications via Grants.gov:**

Effective **February 17, 2015**, EPA grant applicants must use **Grants.gov** to submit their applications. It is highly recommended that EPA applicants complete their registration on Grants.gov now, since the entire process can take up to 30 days to complete. Information located at **Submitting an Application to Grants.gov Apply** and **Applicant Resources** for Grants.gov will help you get started. Applicants are also encouraged to view a previously recorded **EPA Information Webinar** session/ presentation regarding Grants.gov or register for an available session.

Grants.gov support/assistance is available 24 hours a day 7 days a week at 1-800-518-4726 or **Support@grants.gov**. For International callers, call (606) 545-5035 to speak with a Grants.gov Contact Center representative. Also, the **Region 9 Application Checklist** will help ensure your EPA application submitted through Grants.gov is complete.

Guide on Submitting an Application to Grants.gov:

<http://www.epa.gov/ogd/guide/submitting.htm>

Grants.gov Application Resources:

<http://www.grants.gov/web/grants/applicants/applicant-resources.html>

EPA Information Sessions/Webinars:

http://www.epa.gov/ogd/training/grants_gov_information_sessions_for_applicants.htm

Region 9 Application Checklist:

<http://www.epa.gov/region09/funding/pdfs/grantsgov/r9-application-checklist-grantsgov.pdf>

- **Bundling of Grant Application Certifications (for States & Tribes):**

State and Tribal applicants are highly encouraged to submit annually a single set ("bundling") of application certification forms with a cover letter. The letter must indicate the applicable timeframe (usually a federal or state fiscal year) of the certifications for all EPA grant applications received by Region 9 Grants Management Office (GMO) within that period. GMO accepts Adobe format (.pdf) of the letter with applicable signed certification(s) through the electronic mail box:

grantsregion9@epa.gov. Please note that updated forms must be submitted when changes to the responses are required. The following certifications can be bundled:

- ❖ Standard Form (SF) 424B, Assurances for Non-Construction Programs
- ❖ EPA Form 6600-06, Certification Regarding Lobbying, Certification for Contracts, Grants, Loans and Cooperative Agreements
- ❖ EPA Form 4700-4, Preaward Compliance Review Report for All Applicants Requesting EPA Financial Assistance

Applicants are highly encouraged to use bundling of their certifications if multiple EPA applications are submitted annually. Bundling can be especially helpful as EPA is transitioning to Grants.gov. Please contact your EPA Grants Specialist for questions regarding bundling.

EPA Application Forms:

<http://www.epa.gov/ogd/forms/forms.htm>

- **Changes to the Minority & Women Business Enterprise (M/WBE) Utilization Reporting Requirement:**

The EPA issued a revised class deviation from 40 CFR 33.502 on **December 4, 2014**, which supersedes the M/WBE reporting requirement specified in the recipient's Notice of Award. The EPA financial assistance recipients are now required to report annually when certain conditions are met to reach a threshold of \$150,000. Please review the current information from **EPA's Small Business Programs**.

40 CFR 33:

[http://www.ecfr.gov/cgi-bin/text-](http://www.ecfr.gov/cgi-bin/text-idx?SID=04eada1fb1292e21ecf2434ad7bf3781&tpl=/ecfrbrowse/Title40/40cfr33_main_02.tpl)

[idx?SID=04eada1fb1292e21ecf2434ad7bf3781&tpl=/ecfrbrowse/Title40/40cfr33_main_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?SID=04eada1fb1292e21ecf2434ad7bf3781&tpl=/ecfrbrowse/Title40/40cfr33_main_02.tpl)

EPA's Small Business Programs:

http://www.epa.gov/osbp/dbe_reporting.htm

- **Grants Management Training Materials for Tribal Organizations:**

The EPA's Office of Grants and Debarment (OGD) worked with the national Partnership for Environmental Technology Education (NPETE) to develop **training materials for Tribal organizations**. While OGD is no longer able to offer in-person trainings, the training materials, including the training manuals and webinar recordings, are available for download.

Recipient Training:

http://www.epa.gov/ogd/training/recipient_train.htm

Grant Balance Budget Breakdown Sample

Budget Combining New FY16 Funding with FY15 Unexpended Funds

| | FY15 | | | FY 16 | |
|------------------|-------------------|---------------|------------------|-------------|--------------|
| | Initially Awarded | Actual Budget | Unexpended Funds | New Funding | Total Budget |
| Personnel | \$ 37,000.00 | \$ 25,900.00 | 11,100.00 | 22,000.00 | 33,100.00 |
| Fringe | \$ 10,500.00 | \$ 7,350.00 | 3,150.00 | 6,000.00 | 9,150.00 |
| Travel | \$ 5,000.00 | \$ 3,600.00 | 1,400.00 | 2,000.00 | 3,400.00 |
| Equipment | \$ - | \$ - | 0.00 | | - |
| Supplies | \$ 2,800.00 | \$ 1,960.00 | 840.00 | 1,000.00 | 1,840.00 |
| Contractual | \$ - | \$ - | 0.00 | | - |
| Other | \$ 9,000.00 | \$ 7,100.00 | 1,900.00 | 2,000.00 | 3,900.00 |
| Subtotal | \$ 64,300.00 | \$ 45,910.00 | 18,390.00 | 33,000.00 | 51,390.00 |
| Indirect | \$ 16,075.00 | \$ 11,477.50 | 4,597.50 | 8,250.00 | 12,847.50 |
| Total | \$ 80,375.00 | \$ 57,387.50 | 22,987.50 | 41,250.00 | 64,237.50 |
| | | | | | |
| Total Unexpended | | | \$ 22,987.50 | | |

